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February 15, 2011

## **VIA ELECTRONIC FILING**

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D. C. 20554

Re: EB Docket 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Annual § 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

Date filed: February 15, 2011

Name of companies covered by this certification and Form 499 Filer IDs:

Mid-Hudson Cablevision, Inc. 825833 Mid-Hudson Data Corp. 826247

Name of signatory: **Stephen Renault** 

Title of signatory:

Chief Technical Officer, Mid-Hudson Cablevision, Inc.

Vice President, Mid-Hudson Data Corp.

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's Rules, 47 C.F.R. § 64.2009(e), enclosed for filing in the above-referenced docket is the executed annual CPNI Compliance Certificate of Mid-Hudson Cablevision, Inc. and Mid-Hudson Data Corp. (together, "Company").

Attached to the certificate is a summary of Company's CPNI policies and procedures. Because some of the details included in that document could provide a roadmap for unauthorized persons to attempt to obtain CPNI, Company is filing only a redacted version with the Commission's electronic filing system. *See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, Report and Order and Further Notice of Proposed Rulemaking, FCC 07-22, n.167 (rel. April 2, 2007) ("We recognize carrier concerns about providing a roadmap for pretexters with this annual filing, and thus we will allow carriers to submit their certifications confidentially with the Commission."). The redacted language was

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previously provided to the Enforcement Bureau in Company's prior-year filing in this docket, and has not changed.

Respectfully submitted,

Paul B. Hudson

Counsel for Mid-Hudson Cablevision, Inc.

and Mid-Hudson Data Corp

Enclosure

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

- 1. Date filed: February 15, 2011
- 2. Name of companies covered by this certification and Form 499 Filer IDs:

Mid-Hudson Cablevision, Inc.

825833

Mid-Hudson Data Corp.

826247

- 3. Name and Title of Signatory: Stephen Renault, Chief Technical Officer, Mid-Hudson Cablevision, Inc. and Vice President, Mid-Hudson Data Corp.
- 4. Certification:

I, Stephen Renault, certify that I am an officer of the companies named above (collectively, "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the Commission's customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not received any customer complaints in the past calendar year concerning unauthorized release of CPNI. Company does not have any material information with respect to the processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115. Company has therefore not taken any actions in the past year against data brokers, including proceedings instituted or petitions filed by the Company at either state commissions, the court system or at the Commission. The Company has established procedures to report any breaches to the FBI and United States Secret Service, and it has emphasized in its employee training the need for vigilance in identifying and reporting unusual activity in order to enable the Company to continue to take reasonable measures to discover and protect against pretexting and other unauthorized access to CPNI.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.

Stephen Renault

Chief Technical Officer, Mid-Hudson

Cablevision, Inc.

Vice President, Mid-Hudson Data Corp.

Executed February 313, 2011